

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

FILED  
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Andrea Brooks,  
Plaintiff

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v.

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Civil No. 17-cv-40049-TSH

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New Hampshire Family Court, 9th Circuit  
And William Albert D'Errico, Jr.,  
Defendants

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**ANDREA BROOKS PLAINTIFF'S MOTION FOR  
JOINT DECISION MAKING/SHARED CUSTODY**

A hearing was held in New Hampshire Family Court May 31, 2017. Judge Julie Introcaso issued orders June 1, 2017 stating the child would NOT be harmed by overnight visits.

**PLAINTIFF seeks Parenting Time as Follows:**

**DURING THE SCHOOL YEAR (September through June)**

1st, 3rd, and 5th Fridays from school pick-up to Monday school drop-off  
(Tuesday drop-off if holiday weekend)

**Mother's Day**

PLAINTIFF shall have parenting time from 6pm the previous day to  
Monday school drop-off

**Father's Day**

PLAINTIFF agrees to trade weekends if Father's Day occurs on  
PLAINTIFF's weekend

**Thanksgiving Vacation**

During the even years PLAINTIFF shall pick child up at school and have  
Parenting Time for the duration of Thanksgiving vacation (drop off at  
school)

**Christmas Vacation**

During the odd years PLAINTIFF shall pick child up at school and have  
Parenting Time for the duration of Christmas vacation (drop off at school)  
PLAINTIFF shall also have Parenting Time during the even years from  
December 27 through the end of vacation (drop off at school)

**February and April school vacations**

PLAINTIFF shall have Parenting Time during week-long school vacations  
(weekend schedule stays the same. Friday or Sunday 3pm transition)

**SUMMER VACATION (July and August)**


Alternate Parenting Time every two weeks. PLAINTIFF's parenting time starts at the beginning of July. Every other Sunday 3PM transition at Milford NH Police Station

PICKUP and DROP OFF to occur at child's school. Transition between parents to occur at Milford NH Police Station.

**WHEREFORE**, the PLAINTIFF respectfully requests that this Honorable Court:

- A. Grant PLAINTIFF shared legal custody (shared decision-making responsibility) of minor child (WAD)
- B. Grant PLAINTIFF shared physical custody (shared residential responsibility) of minor child (WAD)
  - a. Allowing Andrea Brooks (PLAINTIFF) parenting time as outlined in the schedule above.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Andrea Brooks", with a long, sweeping horizontal stroke extending to the right.

Andrea Brooks (pro se)

July 25 2017